1	BRIAN K. TERRY, ESQ.	
2	Nevada Bar No. 3171	
3	THORNDAL ARMSTRONG, PC 1100 East Bridger Avenue	
4	Las Vegas, NV 89101-5315 Tel.: (702) 366-0622	
5	Fax: (702) 366-0327	
6	E-Mail: bkt@thorndal.com Attorneys for Defendants ERC Specialists, The Law Office of Rocky Crofts and Rocky D. Crofts	
7	IN THE UNITED STATES DISTRICT COURT	
8		
9	DISTRICT OF NEVADA	
10	YAYAS KITCHEN, LLC, a Nevada limited liability company,	CASE NO. 2:23-cv-01558-GMN-VCF
11	Plaintiff,	STIPULATED MOTION TO DISMISS
12		AND ORDER FOR DISMISSAL WITH PREJUDICE
13	VS.	rkejudice
14	ERC SPECIALISTS, LLC., a Utah limited liability company; THE LAW OFFICE OF	
15	ROCKY D CROFTS, LLC; ROCKY D.	
16	CROFTS, an individual; DOES I through X, inclusive; and ROE CORPORATIONS I	
17	through X, inclusive,	
18	Defendants.	
19		
20	Under Fed. R. Civ. P. 41(a)(1)(A)(ii), Defendants ERC Specialists, LLC, The Law Office	
21	of Rocky D. Crofts, LLC, and Rocky D. Crofts (collectively referred to as "Defendants"), and	
22	Plaintiff Yayas Kitchen, move the Court for entry of an Order to dismiss Plaintiff's Complaint	
23	and Defendants' Counterclaim with prejudice. The parties have fully resolved and settled this	
24	case. Each party will bear their own fees and costs.	
25		
26		
27	///	
28		

-1-

Yayas Kitchen v. ERC Specialists, LLC, et al. 1 2:23-cv-01558-GMN-VCF Stipulated Motion to Dismiss and [Proposed] Order for Dismissal with Prejudice 2 3 4 Dated the 8th day of December, 2023. 5 /s/ James A. Beckstrom 6 James A. Beckstrom, Esq. 7 Nevada Bar No. 14032 BECKSTROM & BECKSTROM, LLP 8 400 South 4th Street, Ste. 650 Las Vegas, Nevada 89101 9 10 Dated the 8th day of December, 2023. 11 12 /s/ Brian K. Terry Brian K. Terry, Esq. 13 Nevada Bar No. 3171 THORNDAL ARMSTRONG, PC 14 1100 East Bridger Avenue 15 Las Vegas, NV 89101-5315 16 17 IT IS SO ORDERED: 18 This case shall be dismissed with prejudice, with each party to bear their own fees and costs. 19 20 21 UNITED STATES JUDGE 22 DATED: December 8, 2023 23 24 25 26 27 28

Case 2:23-cv-01558-GMN-VCF Document 16 Filed 12/08/23 Page 2 of 4

Jalene A. Anderson

From: Brian K. Terry

Sent: Friday, December 8, 2023 1:19 PM

To: Jalene A. Anderson

Subject: FW: ERCS and Crofts adv. Yayas - Signed Settlement Agreement

Brian K. Terry | Shareholder | Thorndal Armstrong, PC

1100 E. Bridger Avenue, Las Vegas, NV 89101

Phone: (702) 366-0622 | fax: (702) 366-0327 | bkt@thorndal.com

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From: Ryan P. Atkinson < ratkinson@Strongandhanni.com>

Sent: Friday, December 8, 2023 12:52 PM

To: James Beckstrom <JB@beckstromlaw.com>; Brian K. Terry <BKT@thorndal.com>

Cc: Jordan Greenburg < jgreenburg@strongandhanni.com>

Subject: RE: ERCS and Crofts adv. Yayas - Signed Settlement Agreement

Me too.

Thanks,

Ryan P. Atkinson STRONG & HANNI 102 South 200 East, Suite 800 Salt Lake City, UT 84111 Telephone: (801) 532-7080

Telephone: (801) 532-7080 Facsimile: (801) 596-1508

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Case 2:23-cv-01558-GMN-VCF Document 16 Filed 12/08/23 Page 4 of 4

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Sent: Friday, December 8, 2023 1:51 PM

To: Brian K. Terry < BKT@thorndal.com>; Ryan P. Atkinson < ratkinson@Strongandhanni.com>

Cc: Jordan Greenburg < jgreenburg@strongandhanni.com>

Subject: RE: ERCS and Crofts adv. Yayas - Signed Settlement Agreement

Good with me.

James A. Beckstrom, Esq.

400 S. 4th Street, Suite 650 Las Vegas, NV 89101 O: 725.300.0599 D: 725.201.0166 M. 714.875.0351 F. 725.300.0261

jb@beckstromlaw.com Admitted: NV & CA



From: Brian K. Terry < BKT@thorndal.com Sent: Friday, December 8, 2023 12:51 PM

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Cc: Jordan Greenburg < jgreenburg@strongandhanni.com>

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Ryan and James,

Just to make sure, I will file the revised by James stip and order, correct?

Brian K. Terry | Shareholder | Thorndal Armstrong, PC

1100 E. Bridger Avenue, Las Vegas, NV 89101

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